

**CHILDHOOD INJURY AND
ADULT OCCUPATIONAL INJURY SURVEYS**
OMB No. 0535-0235

A. JUSTIFICATION

This submission is a request for the reinstatement of a previously approved information collection. This survey collects data concerning farm related injuries. The surveys are conducted by the National Agricultural Statistics Service (NASS) in a cooperative agreement with the National Institute for Occupational Safety and Health (NIOSH), a division of the Center for Disease Controls (CDC).

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The primary functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors. NASS has been asked by the National Institute for Occupational Safety and Health (NIOSH) to conduct a series of farm related injury and safety surveys.

The 2012 Childhood Injury and Adult Occupational Injury Survey target population will be the general farming population. A random sample of approximately 50,000 farm operators will be selected for this survey. Data will be collected for both adult and childhood injuries. (In 2013 NASS will not conduct a NIOSH survey, since it would be in conflict with the Census of Agriculture that will be conducted in 2013 referencing the calendar year of 2012.) In 2014, NASS plans to conduct the Childhood Injury and Adult Occupational Injury Survey (Minority Version). This is the same survey instrument as was used in 2012, but its target population will be minority farms only. The sample will consist of a random sample of approximately 50,000 farm operators that were identified as minority-operated by the 2012 Census of Agriculture. The 2007 Census of Agriculture identified approximately 80,000 farms that were operated by minorities and/or Hispanic operators.

Together, the national Childhood Injury and Adult Occupational Injury Survey are designed to: 1) provide estimates of annual childhood nonfatal injury

incidence rates, annual injury frequencies, and descriptive injury information for children under the age of 20 living on, working on, or visiting farming operations in the United States; and 2) provide estimates of the annual occupational adult nonfatal injury incidence rates, annual occupational injury frequencies and descriptive injury information for farm operators and their employees 20 years of age or older. The information collection combines the youth and occupational injury surveys to reduce the number of contacts on the targeted farm population.

NIOSH is mandated to conduct research and make recommendations for the prevention of work-related disease and injury under Section 20 of the Occupational Safety and Health Act, 29 U.S.C. 669 and Section 501 of the Federal Mine Safety and Health Act, 30 U.S.C. 951. A major problem in planning injury prevention programs for farm children is the lack of surveillance data, especially for those injuries that are nonfatal. Injuries to children living on, working on, or visiting farms were the focus of a special NIOSH initiative directed by Congress in FY 1997. Information on occupational related injuries was the focus of a NIOSH initiative directed by Congress in 1990. Obtaining injury information on farm operators and their adult employees is important to the design and implementation of occupational injury prevention programs on farms.

For this survey, an injury is defined as any condition that results in one-half day or more of restricted activity (youth missed school, youth or adult could not perform normal activities, youth or adult missed work). An agricultural injury is defined as any injury meeting this definition that occurred to a youth less than 20 years of age on the farm property (including the homestead). This definition excludes injuries that occur to youth off the farm site (e.g., injury at school or athletic events), unless that injury is associated with farm work. An adult occupational injury is defined as any injury meeting the definition of an injury involving a farm operator or employee 20 years of age and older that occurred as a result of performing work for the farming operation, either on or off the farm.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The objective of this project is to develop a uniform inquiry for determining the frequency, incidence rate, and characteristics of childhood agricultural injuries occurring in the United States and to obtain similar information on occupational farm injuries of adults. Results of each study will provide estimates at the regional and national level for youth injuries and adult occupational injuries. The survey conducted in 2012 referencing the calendar year 2011 will be a random sample of the entire farming population, creating a base line of the total farm related injuries. The survey that is

scheduled to be conducted in 2014 referencing 2013 will target minority farm operators and will collect data on injuries for children and adults that are associated with these farms. Both the 2012 and the 2014 sample sizes will be an estimated 50,000 farm operators. All farm operations will be asked the childhood injury questions. A sub-sample of approximately 25,000 operators will be asked to complete the adult occupational injury questions.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Web-based or electronic data reporting is currently being studied for all NASS information collections and many conversions have already been done. However, due to the nature of this reimbursable program, NASS feels that the development of a web-based instrument would not be practical at this time. However, it should be noted that all NIOSH data collection efforts are completed using Computer Assisted Telephone Interviewing (CATI) tools. Using CATI for data collection improves the overall efficiency of the survey effort and helps to minimize respondent burden by ensuring that each operator is only asked questions that are pertinent to their operation.

- 4. Describe efforts to identify duplication.**

NASS cooperates with other Federal Agencies, State Departments of Agriculture, and Land Grant Universities to conduct agricultural surveys. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. There is no duplication of questions asked of producers in this docket. NASS samples are coordinated to ensure that respondent burden is minimized. Information derived from these surveys is not available from any other sources.

The National Institute for Occupational Safety and Health (NIOSH) has contacted and assessed data collected by the Department of Labor, Consumer Products Safety Commission, the National Center for Health Statistics, and the National Safety Council to determine if more current information was already available on occupational farm injury data that was nationally representative of all farming operations. Such information was not available from these sources, nor were they aware of any such data being collected by any other agencies. Current information on childhood and adult agricultural injury data at the national level is not available from these

sources either, nor was there any knowledge of any other sources of these data.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

NASS is always trying to find ways to improve the flow of our questionnaires so that the respondent burden placed on any operator is kept to a minimum. The sample size for the two reference periods (2012 and 2014) will be approximately 50,000 operators each year to represent the nearly 2.1 million farm operators in the United States. Information requested on the Childhood Injury and Adult Occupational Injury questionnaires can be provided with a minimum of difficulty by the respondents, generally with little or no reference to their record books. A brief series of screening questions allows the large number of respondents who do not qualify for the injury survey to screen out quickly. Based on historic data, we know that the number of farm related injuries is much more prevalent with adults than it is with children. As a result, we will only ask the adult injury questions of approximately half of the sample, and the entire sample will have the potential of being asked the childhood questions, if they do not first screen out. In the past this method of data collection has yielded comprehensive data that can be published on a regional and national level, while minimizing respondent burden.

Combining the childhood injury survey and the adult occupational farm injury survey into one questionnaire helps to reduce the number of contacts on the population.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the data collection is not conducted, it will prevent NIOSH from establishing an ongoing surveillance system to track farm injuries occurring in the U.S. This will decrease NIOSH's ability to direct both the childhood and adult farm injury prevention programs requested by Congress. Not having this data collection will also decrease NIOSH's ability to track changes in farm-related injuries over time, and decrease the ability to evaluate the impact of its injury prevention efforts.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to report information to the agency more often than quarterly;...

There are no special circumstances associated with this information collection.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Notice soliciting comments was published in the Federal Register on March 26, 2012 on pages 17405 - 17406. Two comments were received from the same individual that did not warrant a response.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

In 1997, NIOSH requested comments from all interested parties to provide input on all aspects of the NIOSH initiative as part of their specifications process. This process included a peer review by academic experts on the methods and scope of the surveillance activities to be conducted by NIOSH.

In addition to academic experts, NIOSH contacted the U.S. Department of Agriculture, the U.S. Department of Labor, the U.S. Consumer Products Safety Commission, the National Center for Health Statistics, the University of Minnesota, and the National Safety Council on whether they were collecting youth farm injury data that would meet the needs of NIOSH. They were also contacted to determine if information was already available on occupational farm injury or tractor demographics that were nationally representative of all farming operations. None of this information was available.

During fiscal year 2009, NIOSH again requested input from all interested parties on this surveillance activity through a request for comment in the Federal Register. The majority of the comments received by NIOSH from this request were positive, stating that the NIOSH Childhood Agricultural Injury Surveillance data were unique, valuable to our constituents, and should be continued.

- 9. Explain any decision to provide any payment or gift to respondents.**

There are no payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

The NIOSH survey is conducted totally by telephone interviews. NASS will notify respondents of the confidentiality of their data in the pre-survey and publicity materials we send to the respondents prior to beginning data collection.

11. Provide additional justification for any questions of a sensitive nature.

If the respondent is married or single, living with a partner, the sex of the respondent's spouse or partner is asked. This question is necessary to get a complete picture of the demographic makeup of the household and will have an impact in assessing household adults who may be at risk for work-related injuries on the farm.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Average completion time per questionnaire shown below is based on the average time to complete the survey last year. The operations that screened out or who did not have any injuries during the reference period took approximately 5 minutes to complete the survey. Operations that had reported injuries during the reference period took 10 to 15 minutes to complete the survey. The overall estimated time to complete the questionnaire is 10 minutes. The survey will be conducted 100% by telephone. The skip technique used for this survey will allow respondents that did not have any farm injuries to screen out very quickly from the survey. Surveys will only be conducted in 2012 and 2014. A NIOSH Survey

will not be conducted in 2013 due to the Census of Agriculture being conducted that year. The following table shows the annual average burden for the three year approval period.

Projected Respondent Burden for 2012 - 2014

Survey	Reference Year	Survey Year	Sample Size	Freq	Responses				Non-response				Total Burden Hours
					Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours	
Year 1	2011	2012											
General Injury Survey (all farm operators)			50,000	1	40,000	40,000	10	6,667	10,000	10,000	2	333	7,000
Pre-Survey Letter and Publicity Materials			50,000	1	40,000	40,000	10	6,667	10,000	10,000	2	333	7,000
Year 2	2012	2013											
No Survey Conducted	Due to NASS conducting the Census of Agriculture in 2013 for the reference year of 2012, the NIOSH survey will be postponed this year to help minimize respondent burden.		0	0	0	0	0	0	0	0	0	0	0
Pre-Survey Letter and Publicity Materials			0	0	0	0	0	0	0	0	0	0	0
Year 3	2013	2014											
General Injury Survey (minority farm operators)			50,000	1	40,000	40,000	10	6,667	10,000	10,000	2	333	7,000
Pre-Survey Letter and Publicity Materials			50,000	1	40,000	40,000	10	6,667	10,000	10,000	2	333	7,000
Total			100,000		80,000	160,000		26,667	20,000	40,000		1,333	28,000

Annual average reporting time of 9,333 hours is multiplied by \$24 per hour for a total estimated cost to the public of \$223,992.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no capital/startup or ongoing operation/maintenance costs associated with this information collection period.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

NIOSH has contracted with NASS to collect the data. The contracted cost for NASS to conduct this survey is \$700,000 per year. This will cover the costs for staff labor, fringe benefits, materials and supplies, use of equipment and facilities, field tests, telephone, and general administrative overhead costs, enumerator training and data collection.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

The annual number of respondents will decrease from 150,500 down to 33,334, a net decrease of 117,166. The annual average burden will decrease from 12,111 to 9,333 hours, a net decrease of 2,778 hours.

Previously Reported	Completed Reports	Non-Response Reports	Totals
Number of Respondents	150,500	-	150,500
Burden Hours	12,111	-	12,111
Corrections to Previously Reported Data			
Corrections to Previously Reported Data	Completed Reports	Non-Response Reports	Totals
Number of Respondents	40,133	10,034	50,167
Burden Hours	11,705	406	12,111
Changes Due to Adjustments in Agency Estimates			
Differences to Previously Reported Data	Completed Reports	Non-Response Reports	Totals
Number of Respondents	(110,367)	10,034	(100,333)
Burden Hours	(406)	406	-

Changes Due to Agency Discretion			
	Completed Reports	Non-Response Reports	Totals
Number of Respondents	13,201	3,300	16,501
Burden Hours	(2,816)	38	(2,778)

The reduction in sample size and burden hours is due to miscellaneous actions. In the previous submission the 150,500 that was accidentally reported for number of operators was the total number of respondents for the three year period, rather than the annual average number which should have been 50,167. This will result in an adjustment of the agency estimate with a reduction of 100,333 respondents. However, the previous average number of burden hours was reported correctly.

The decrease in burden hours and increase in number of respondents is due to the agency's discretionary change by deciding to only conduct the survey twice during the upcoming three year approval request, instead of annually. The NIOSH survey will not be conducted in 2013, since NASS will be conducting the 2012 Census of Agriculture that year. Also, in the previous submission we stated that we would be contacting the target operators once each year; for clarity we will be sending the operators a pre-survey letter and publicity materials, then follow this up with a contact by telephone to conduct the survey.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire**

project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

All editing of the data will be conducted by NASS, beginning when the first data is received. For the 2012 survey, data will be received in late September of 2012. For the 2014 (minority farm operator) survey, data will be collected in late April or mid-May of 2014. The edited data files will be provided to NIOSH, who will conduct the data analysis and summarization. Frequency tables using various categorical groups, will be developed at both the regional and national level. A joint NASS/NIOSH release of the major results of the data analysis will be issued in the winter of 2012 and 2014. NIOSH products include: technical reports to be published by NIOSH at a major agricultural safety and health conference in June of 2013 for the 2012 study, and in 2015 for the minority farm operator study; informational pamphlets targeting farm operators and farm families in the summer of 2013 and 2015 respectively; and a NIOSH release of detailed results in December 2013 and 2015. Peer reviewed journal articles based on results of these two surveys are expected to be published during 2013 and 2015.

The complete results of the 2010 data are not yet published but the information from the 2010 and other past surveys have been presented in several forums, including peer reviewed journal articles. See the attached file "NIOSH-USDA Publications.doc" for a more complete list of different products from the past surveys.

The development, data collection, and publication dates are shown below for the 2012 Childhood Injury and Adult Occupational Injury Survey.

Questionnaire design	June - July 2011
Systems development	May - June 2012
Sample selection	June-July 2012
Advance letter	August 2012
Telephone interviews	August-September 2012
Process and edit data	September 2012
Data file to NIOSH	October 2012
Tabulate and analyze data	November 2012-March 2013
Press Release (preliminary)	February 2013
Publication of full report	December 2013

The funding level for NIOSH will ultimately determine the final sample size for the 2012 and 2014 data collection efforts. If the funding is lower than expected for each study the sample sizes may be decreased to account for the difference. However, we do not anticipate the purpose, method, content, and survey development time will be significantly impacted by the level of funding.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

There is no request for approval of non-display of the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.**

There are no exceptions to the certification statement.

May 2012

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